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*Attorneys for Defendant Lyft, Inc*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

THE STATE OF NEVADA, DEPARTMENT  
OF EMPLOYMENT TRAINING AND  
REHABILITATION, *ex. rel.* Chagolla

Plaintiff,

vs.

LYFT, INC.,

Defendants.

Case No.: 3:23-cv-00442-LRH-CLB

**ORDER GRANTING STIPULATION  
TO EXTEND THE DEADLINE FOR  
DEFENDANT TO FILE A RESPONSE  
TO PLAINTIFF'S COMPLAINT FOR  
VIOLATIONS OF THE NEVADA  
FALSE CLAIMS ACT**

**(FIRST REQUEST)**

Defendant Lyft, Inc. ("Defendant"), by and through its counsel, Jackson Lewis P.C., and Relator Christina Michelle Chagolla ("Relator"), by and through her counsel, Thierman Buck LLP, hereby stipulate and agree to extend the time for Defendant to file an answer or otherwise respond to Plaintiff's Complaint for Violations of the Nevada False Claims Act (the "Complaint") by 30 days through and including October 12, 2023. On February 8, 2023, an action was commenced in the Second Judicial District of Washoe County, Nevada, captioned *The State of Nevada, ex. rel. Chagolla v. Lyft, Inc.* On August 3, 2023, Defendant was served with the Summons and Complaint. On September 5, 2023, Defendant removed the action to this Court pursuant to 28 U.S.C. § 1332, diversity jurisdiction. As such, Defendant's answer or response to the Complaint is currently due September 12, 2023. Plaintiff and Defendant have agreed to an extension of time for Defendant to answer or otherwise respond to the Complaint to allow defense counsel sufficient time to investigate the allegations of the Complaint.

1 Defendant shall, therefore, have a 30- day extension up to and including October 12, 2023,  
2 to file an answer or otherwise respond to Plaintiff's Complaint.

3 This stipulation and order are sought in good faith and not for the purpose of delay. No prior  
4 request for any extension of time has been made.

5 Dated this 12th day of September, 2023.

6 THIERMAN BUCK LLP

JACKSON LEWIS P.C.

7  
8 /s/  
LEAH L. JONES, ESQ.  
9 Nevada Bar No. 13161  
7287 Lakeside Drive  
10 Reno, Nevada 89511

/s/ Joshua S. Sliker  
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11 *Attorneys for Relator Christina Michelle*  
12 *Chagolla*

*Attorneys for Defendant*  
*Lyft, Inc.*

13  
14 **ORDER**

15 **IT IS SO ORDERED:**

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17 Dated: September 13, 2023

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HON. CARLA BALDWIN  
19 UNITED STATES MAGISTRATE JUDGE  
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